

**CALIFORNIA CONSUMER PRIVACY ACT OF 2018**  
**NOTICE TO EMPLOYEES, WORKERS, CONTRACTORS,**  
**APPRENTICES, INTERNS AND APPLICANTS**

**1. INTRODUCTION**

1.1 This Notice is for California residents and is provided in connection with the California Consumer Privacy Act of 2018 (CCPA). This Notice describes what personal information we collect about you, how we will use such personal information, and who we may disclose it to.

1.2 This Notice applies to our current employees, workers (including agency workers), contractors, apprentices, interns and applicants. This Notice does not form part of any contract of employment or other contract to provide services. We may update this Notice at any time.

1.1 In this Notice references to:

1.1.1 **we, us or our** means The Cooper Companies, CooperVision, Inc., Eye Care Prime LLC, Blanchard Vision Corp., Paragon Vision Sciences, Inc., CooperSurgical, Inc. and CooperGenomics, Inc.

1.1.2 **personal information** is information that is about you and which identifies you; and

1.1.3 references to the **Cooper Group** are to companies within the Cooper group of companies. A list of the Cooper Group companies is shown at the end of this policy.

**2. WHAT PERSONAL INFORMATION DO WE HOLD ABOUT YOU?**

2.1 We may collect, process and use the following categories of personal information about you.

<b>Category of personal information</b>	<b>Examples</b>
Identifiers	Your name(s); an alias or unique personal/online identifier (such as user name or login name); address; email address; username; internet protocol (IP) address.
Additional Identifiers	Company email address; place of work; company telephone number; company mobile number; marital status; signature; photograph; voice, physical characteristics or description; state identification card number; insurance policy number; social security number; bank account number, credit card number, debit card number, or any other financial information; medical information (including your contact lens prescription) or health insurance information.
Characteristics of Protected Classifications	Age (over 40), race, religion, gender, national origin, or sexual orientation; health, medical condition, health and sickness records; criminal convictions and offenses

Category of personal information	Examples
Under California or Federal Law	
Commercial Information	Records of products or services purchased, obtained, or considered; or other purchasing or consuming histories or tendencies; purchases made through corporate credit cards; details of amounts owed/paid to contractors and relevant bank account or other payment details and any relevant tax information; credit reference checks (for certain roles)
Biometric information	Height; weight; body mass; fingerprints
Internet or Other Electronic Network Activity information (“Electronic Information”)	Browsing history; search history; information regarding interactions with an internet website, application, or advertisement; cookies; IP address of your device, information about the operating system and/or app you are using; unique device identifiers; pages that you navigate to and links that you click; your preferences and settings; swipe card access records.
Geolocation Data	Location information collected by a browser or inferred by IP addresses, mobile device signals
Sensory Information	Audio (e.g., voicemails), electronic, visual, thermal, photographs/images; olfactory; conference call recordings/video images; images captured via CCTV
Professional or employment-related information	Job titles; location of employment or workplace; work history; working hours; performance/training records, professional memberships; compensation information and history; disciplinary and grievance information; start and end date of employment / services provided; letters of offer and acceptance of employment contracts; letters confirming changes of role; payroll number; forms relating to the application for, or in respect of changes to, employee benefits (again where relevant); qualifications gained while in employment; training records; succession planning details; application forms; CVs/resumes; employment history; references, credit reference checks (for certain roles) and data created by us during the recruitment process (such as interview notes or records of assessment scores where relevant); performance evaluations and reviews; evidence gathered for disciplinary action or termination; details of disciplinary warnings; details of grievance investigations and outcomes; policy acknowledgement sign off sheets
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C.	Details and verification of education and qualifications; CVs / resumes

Category of personal information	Examples
Section 1232g, 34 C.F.R. Part 99))	
Inferences Drawn From Personal Information	Reviews and evaluations; interview notes; credit reference checks (for certain roles); performance evaluations and reviews; evidence gathered for disciplinary action or termination; performance evaluations and reviews, evidence gathered for disciplinary action or termination, details of disciplinary warnings, details of grievance investigations and outcomes, details of grievance investigations and outcomes; references

2.2 We may receive the personal information about you from the following sources:

- 2.2.1 information from reference checking agencies (including but not limited to court judgments, or employment checks);
- 2.2.2 recruitment information (including copies of right to work documentation, references and other information included in a CV/resume or cover letter or as part of the application process) from recruitment businesses or temporary work agencies;
- 2.2.3 information obtained from a background checking provider (including but not limited to checks to verify your employment history and qualifications);
- 2.2.4 health / medical information from your doctor or occupational health physicians;
- 2.2.5 information from staff surveys that may be carried out from time-to-time and which we may use third parties to deliver;
- 2.2.6 IRS (state tax department) and other government agencies/departments;
- 2.2.7 pensions and benefits providers; and
- 2.2.8 providers of training and learning and development courses (including higher and further education institutions);

### 3. INFORMATION ABOUT THIRD PARTIES

3.1 In the course of your dealings with us you may provide us with personal information relating to third parties, including but not limited to details of your next of kin and emergency contact(s) (as applicable), beneficiaries (stated on an expression of wishes form); and employment references.

3.2 We will use this personal information in accordance with this Notice. If you are providing personal information to us relating to a third party, you must have the permission of the third party to share such personal information with us and you must make the information in this Notice available to the third party.

#### **4. HOW DO WE USE THE PERSONAL INFORMATION WE COLLECT ABOUT YOU?**

There are some general things for which we use your personal information. We use the information for communications to you, to make determinations, to provide support, and to perform legal, compliance and other administrative activities in connection with your current, perspective or former employment with us. The types of general uses include:

- record keeping, statistical analysis, internal reporting and research
- hosting, maintaining and otherwise supporting the operation of our websites and other communication platforms, and helping to customize and improve your experience with our websites and other platforms
- to investigate or otherwise address complaints made by you or disputes between you and us
- detecting and preventing fraud or other criminal offenses;
- risk management
- business and disaster recovery (e.g. to create back-ups)
- network and information security
- monitor your use of our information and communication systems to ensure compliance with our IT policies and the standards of conduct expected of our employees, interns, workers and contractors
- document and data retention/storage

We also use personal information to help us establish and maintain a relationship with you, through things like:

- creating an account(s) with us or for identification purposes
- making a decision about your recruitment or appointment and determining the terms on which you work for us; assessing qualifications for a particular job, including decisions about promotions; assessing your fitness to work (for employees, workers, apprentices, interns and job applicants)
- paying you and, where we are obliged to, deducting tax and social security contributions; conducting salary reviews and making decisions about compensation (including discretionary bonuses and equity grants); providing benefits to you
- to comply with our procedures in relation to grievance or disciplinary proceedings and to make decisions on disciplinary sanctions and whether grievances should be upheld (this may involve your personal information being used as evidence in such processes (for example through notes of meetings/statements you give as part of the process)
- monitoring attendance
- administering the contract(s) that we have entered into with you (where relevant)

- conducting your performance reviews, managing performance and determining performance requirements (in relation to employees, apprentices, interns and workers, except agency workers)
- Compiling directories (for example of staff company telephone numbers, email addresses, staff photographs and job titles)
- providing education, training and career development requirements
- checking you are legally entitled to work in the United States and the State of California
- communicating with you during and after your employment or services
- contacting next of kin in an emergency situation (this may not apply to contractors)
- ordering products or services from us
- processing a payment at your request or on your behalf
- confirming your authorization of transactions

When you use our websites, or third-party platforms or applications, we collect Identifiers, Additional Identifiers, Electronic Information and Geolocation Data about your usage of the service for:

- personalize your experience with us
- enabling your use of the services available on our sites, applications or platforms
- contacting you about our products, services or other news that may be of interest to you.

We use Geolocation Data (which may be collected from your personal or company computer, devices, or telephone; and your use of our applications or platforms):

- to identify where you are contacting us from
- to determine compliance with applicable company policies

We may be required to collect your personal information to comply with our legal requirements, to enable us to fulfil the terms of any contract that we have with or in preparation of us entering into a contract with you.

## **5. CRIMINAL RECORDS INFORMATION**

5.1 We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.

## 6. HOW AND WHEN DO WE SHARE PERSONAL INFORMATION WITH THIRD PARTIES?

6.1 We may share your Personal Information with members of our corporate group in order to provide the products and/or services or information that you have requested. We may also share your information with other members of our corporate group for the purposes of IT support and maintenance, internal governance and administration, and to comply with our legal or regulatory obligations.

6.2 We will not share your personal information with a third party outside our corporate group, except:

- when you permit us to do so
- where you have instructed us to share your personal information with third-party sites or platforms, such as social networking sites (please note that once we share your personal information with another company, the information received by the other company is controlled by that company and becomes subject to the other company's privacy practices)
- when parties perform services on our behalf, like product delivery, marketing and advertising, customer service, IT services and solutions (e.g. providing data storage, assisting us with database management) or rebate fulfilment. These companies are prohibited from using your personal information for purposes other than those requested by us or required by law
- when we share your personal information with third-parties in connection with the sale of a business or to enforce our terms or rules

6.3 We may also share your personal information with:

- our accountants, auditors, lawyers or other professional advisers when we ask them to provide us with professional advice
- any other third party if we are under a duty to disclose or share your personal information in order to comply with any legal obligation; to protect the rights, property and/or safety of the Cooper Group and others; or in other cases if we believe in good faith that disclosure is required by law
- any other third party for the purposes of acting in accordance with the requirements of a court, regulator or government agency, for example, complying with a court order or acting in accordance with an applicable law or regulation. However, nothing in this California Privacy Policy is intended to limit any legal defenses or objections that you may have to a third-party's, including a government's, request to disclose your personal information
- to address fraud, security, or technical issues

We **do not** share, sell, rent, or trade personal information with third-parties for their commercial purposes.

## **7. HOW LONG DO WE STORE PERSONAL DATA?**

7.1 It is our policy to retain your personal information for the length of time required for the specific purpose or purposes for which it was collected (e.g., for the fulfilment of an agreement with you). However, we may be obliged to store some personal information for a longer time, taking into account factors including:

- legal obligation(s) under applicable law to retain data for a certain period of time (e.g. compliance with tax and accountancy requirements)
- the establishment, exercise or defense of legal claims (e.g., for the purposes of a potential dispute)

7.2 If you would like to find out how long we keep your personal information for a particular purpose, you can contact us at: [dpo@coopervision.com](mailto:dpo@coopervision.com) or [ccparequests@coopersurgical.com](mailto:ccparequests@coopersurgical.com).

## **8. HOW DO WE PROTECT YOUR PERSONAL INFORMATION?**

8.1 We implement technical and organizational security measures to protect your personal information against the risk of loss, misuse, or unauthorized alteration or destruction. Such measures may include the use of firewalls, encryption (where appropriate), access rights management processes, careful selection of processors and other technically and commercially reasonable measures to provide appropriate protection for your personal information. Where appropriate, we may also make backup copies and use other such means to prevent accidental damage to or destruction of your personal information.

8.2 Please note that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure. For any payments which we take from you online we will use a recognized online secure payment system.

## **9. CHANGES TO OUR NOTICE**

9.1 Any changes we make to this Notice in the future will be notified to you by email or otherwise via team briefings, the intranet or noticeboards. The updated Notice will take effect as soon as it has been updated or otherwise communicated to you.

This Notice is effective as of January 1, 2020.

## **Addendum 1**

### **Cooper Group**

- CooperVision, Inc., 6101 Bollinger Canyon Rd #500, San Ramon, CA 94583 USA
- Eye Care Prime, LLC, 5870 Stoneridge Drive, Suite 1 Pleasanton, CA 94588
- Blanchard Vision Corp., 1552 Rue King Ouest, Sherbrooke, Quebec J1J 2C3, Canada
- Paragon Vision Sciences, Inc., 2120 W. Guadalupe Rd., Suite 112, Gilbert, AZ 85233 USA
- CooperVision Limited (company number 03685161) with its registered address at Delta Park, Concorde Way, Segensworth North, Fareham, Hampshire, PO15 5RL, UK
- CooperVision Manufacturing Limited (company number 02737396) with its registered address at Delta Park, Concorde Way, Segensworth North, Fareham, Hampshire, PO15 5RL, UK
- CooperVision SAS (company number 392 002 218) with its registered address at Les Collines De Sophia, 1800 Route Des Cretes, Sophia Antipolis 06905, Cedex, France
- CooperVision Italia, S.R.L. (company number 10653750157) with its registered address at Via Meravigli, 16 – 20123 Milan, Italy
- CooperVision Iberia, S.L. (company number 79424594) with its registered address at Ronda de Poniente, 12, 28760 Tres Cantos, Madrid, Spain
- CooperVision Nordic AB (company number 556568-1243) with its registered address at Johan Willins gata 8, SE-41664 Goteborg, Sweden
- CooperVision GmbH (company number HRB 33358) with its registered address at Siemensstraße 3, 64859, Epperthausen, Germany
- CooperVision Nederland B.V. (company number 23075034) with its registered address at Avelingen - West 40, 4202, MS Gorinchem, Netherlands
- CooperVision Poland Sp. z o.o. (company number 0000464435) with its registered address at Przemysława Gintrowskiego 53, 02-697 Warsaw, Poland
- CooperVision Kft (company number 01-09-166734) with its registered address at Sopron ut 25-27, Budapest, 1117, Hungary
- CooperVision Limited, organizacni slozka (company number 24838411) with its registered address at Na Pankráci 1724/129, Praha 4, 140 00, Czech Republic
- CooperVision Distribution Sprl (company number 0879.484.449) with its registered address at Premiere Avenue 32, B-4040, Belgium
- CooperSurgical, Inc., 75 Corporate Drive, Trumbull, CT 06611, USA
- CooperGenomics, Inc. 75 Corporate Drive, Trumbull, CT 06611, USA